

BRETT A. SHUMATE  
Assistant Attorney General  
YAAKOV M. ROTH  
Principal Deputy Assistant Attorney General  
Civil Division  
WILLIAM H. WEILAND  
Acting Assistant Director  
ANNA DICHTER  
Senior Litigation Counsel  
ERIC SNYDERMAN  
LAUREN BRYANT  
CATHERINE ROSS  
AMANDA B. SAYLOR  
JEFFREY M. HARTMAN  
DANIEL CAPPELLETTI  
SHELBY WADE  
Trial Attorneys  
U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
General Litigation and Appeals Section  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et al.*,  
Plaintiffs,  
v.  
KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, *et al.*,  
Defendants.

Case No. 3:25-cv-5687

**NOTICE OF ERRATA RE:  
ADMINISTRATIVE RECORD  
NICARAGUA TPS  
TERMINATION (ECF No. 63)**

NOTICE OF ERRATA RE: ADMINISTRATIVE RECORD  
NICARAGUA TPS TERMINATION  
No. 3:25-cv-5687

**NOTICE OF ERRATA REGARDING THE ADMINISTRATIVE RECORD – NICARAGUA**

Defendants, by and through undersigned counsel, respectfully file this Notice of Errata regarding the Certified Administrative Record (“CAR”) that Defendants filed on July 28, 2025. ECF No. 63. After filing the CAR, Defendants became aware that it did not contain the signature page of the USCIS Decision Memorandum indicating the date on which the determination was made. Defendants now submit the full USCIS Decision Memorandum with the correct signature page unredacted. The remainder of the memorandum is protected by the deliberative process privilege. *See Blue Mountains Biodiversity Project v. Jeffries*, 99 F.4th 438, 445 (9th Cir. 2024) (the “whole record” is ordinarily the ‘record the agency presents’ and certain ‘predecisional deliberative materials’ are not properly included in the whole record). The redacted memorandum with relevant signature pages has been appended to the CAR on bates-stamped pages 1,710-16.

1 Dated: August 4, 2025

Respectfully submitted,

2 BRETT A. SHUMATE  
Assistant Attorney General

3 YAAKOV M. ROTH  
4 Principal Deputy Assistant Attorney General  
Civil Division

5 WILLIAM H. WEILAND  
6 Acting Assistant Director

7 ANNA DICHTER  
Senior Litigation Counsel

8 ERIC SNYDERMAN  
9 LAUREN BRYANT  
10 CATHERINE ROSS  
DANIEL CAPPELLETTI  
11 AMANDA B. SAYLOR  
Trial Attorneys

12 /s/ Shelby Wade  
SHELBY WADE  
13 (NY Bar No. 5696067)  
Trial Attorney  
14 U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
15 General Litigation and Appeals Section  
P.O. Box 868, Ben Franklin Station  
16 Washington, DC 20044  
Tel: (202) 285-8379  
17 Shelby.Wade2@usdoj.gov

18 *Attorneys for the Defendants*